

GAO

Mid-Level Employees Council

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Mid-Level Employees Council

Summary of 1990 and 1991 Activities

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Abbreviations

ACCR	Advisory Council on Civil Rights
EEO	equal employment opportunity
GAO	General Accounting Office
OIP	Operations Improvement Program
PAB	Personnel Appeals Board
FFP	Pay for Performance
QM	Quality Management

Summary of 1990 and 1991 Activities

The Mid-Level Employees Council's¹ major efforts during 1990 and 1991 were providing comments on proposed changes to GAO's Pay-for-Performance (PFP) compensation system, participating in the development of the Quality Management (QM) implementation plan, and concluding the labor order litigation initiated by the Council in October 1989. In addition, the Council monitored and commented on a number of other issues of interest to constituents. Finally, the Council made a conscious effort to better serve constituents by improving communications within and through the Council, considering alternatives to enhance constituent representation, and developing a framework for future Council activities.

Background and Organization

The Council was established in June 1980 to represent the views of GS-13s and GS-14s to top management and to give management a significant knowledge and experience base. The Council's objectives, as stated in its draft revised charter, are to

- seek and present to management the views and concerns of constituents;
- provide input to the management process by proposing, assessing, and debating GAO plans, policies, and procedures; and
- communicate to constituents both Council and GAO management issues and concerns.

The Council, which now represents Band IIs, GS-13s, and GS-14s, is currently composed of 30 representatives, including 2 from each of the 4 largest operating divisions and 1 representative from each remaining division and the Office of the General Counsel. Each regional and overseas office has one representative, and two represent all staff offices. The Council representatives for 1991 and 1990 are listed in appendixes I and II, respectively. The Council is headed by a Steering Committee consisting of the Chair, the Vice Chair, the Secretary, and the Study Group Coordinator.

¹The Council was known formerly as the Management and Policy Advisory Council.

Major Efforts

PFP and QM topics clearly dominated Council activities over the past 2 years. The Council responded to frequent requests from the Deputy Assistant Comptroller General for Human Resources to comment on unit experiences with PFP, as well as proposed changes to the process. While recognizing that comparable comments were also provided by unit managers, focus groups, and other employee organizations, the Council believes that it contributed to the PFP changes that were made during the last 2 years.

The Council's involvement in QM has included participating in five QM working groups, receiving status reports from the Director of GAO's QM program at the Council's semiannual national meetings, and observing the monthly GAO Quality Council meetings. As with PFP, the Council contributed to the QM dialogue and planning effort.

The Council's other major effort over the last 2 years resulted from its concern that GAO's labor management relations order was overly restrictive. Through formal litigation before GAO's Personnel Appeals Board (PAB), this concern was validated and resulted in the agency's making required changes to the order.

Pay for Performance

In 1989, GAO implemented the bonus portion of the PFP system. In the fall of 1989, the Council briefed the Assistant Comptroller General for Operations and the Deputy Assistant Comptroller General for Human Resources on constituent views of the process. In summary, the Council thought the bonus process was inconsistently implemented, instructions for preparing contribution sheets were confusing, and feedback from panelists was often meaningless. In 1990, GAO added permanent pay increases to the PFP system. During 1990 and 1991, the Council continued to work with GAO management to address PFP issues of concern to its constituents. The Council was especially concerned about

- the arbitrary 50-percent cutoff for bonuses used in 1989 and 1990,
- the arbitrary 15-percent cutoff for no bonuses used in 1989 and 1990 and for no pay increases in 1990,
- the conflict-of-interest issue concerning ratings of Band IIs by Band IIs,
- the revised 10-percent cutoff for no bonuses or pay increases used in 1991,
- the lack of or inconsistent feedback throughout the organization,
- the numerical ranking of staff used in 1989 and 1990,
- weighting of performance appraisals and contribution statements used in 1989 and 1990, and

- publicizing top bonus recipients.

Not surprisingly, the Council devoted a large portion of each semiannual meeting discussing issues related to PFP and broad banding with GAO management and the PAB General Counsel. The Council was also asked to comment on proposed changes to the system a number of times during 1990 and 1991. The Council believes that it has provided GAO management meaningful and convincing comments resulting in significant changes to the PFP system implemented in 1989 and 1990. Major changes to which the Council probably contributed include

- giving managers the flexibility to award more bonuses, rather than limiting bonuses to only the top 50 percent;
- elimination of numerical rankings;
- elimination of the weighting process used for performance appraisals and contribution statements;
- provisions to avoid conflict of interest by having separate groupings for Band IIs rated by Band IIIs and Band IIs rated by Band IIs; and
- reducing the bottom group to 10 percent rather than 15 percent.

Quality Management

As GAO has introduced its QM philosophy, the Council has worked to stay in the forefront of this activity. The Council has (1) kept abreast of what GAO is doing or planning to do and (2) communicated such actions to constituents. During 1991, the Council was briefed at each meeting by the Director for Quality Management and responded to various requests for comments on QM plans and implementation. In addition, at the request of the Director, Council representatives served on five working groups: (1) Key Process Analysis; (2) Rewards, Recognition, and Compensation; (3) Suggestion System; (4) Organizational Structure; and (5) Communications. Also, the Council Chair attended every monthly GAO Quality Council meeting as an observer.

Labor Relations

In October 1989, the Council, represented by the PAB General Counsel, decided to file a formal Petition for Review with the PAB concerning two provisions in GAO's labor management relations order,² GAO Order 2711.1. Specifically, the Council challenged GAO's (1) definition of a supervisor,

²The Council was joined in its Petition for Review by the Career Level Council (GS-13/14 Management and Policy Advisory Council and Career Level Council v. U.S. General Accounting Office, Docket No. 116-600-GC-89).

which presumed that certain employees were supervisors on the basis of the positions they held rather than the duties they performed, and (2) prohibition of employees' belonging to a labor organization affiliated with any other labor organization in the United States. After consultation with the two Councils, the PAB General Counsel and the GAO General Counsel reached agreement on the supervisor issue in August 1991. GAO agreed to change the definition to delete the supervisor presumption to be consistent with chapter 71 of title 5 of the U.S. Code. Regarding the nonaffiliation provision, the full Board ruled in favor of the Councils on September 20, 1991. By doing so, the position limiting GAO evaluators and attorneys to membership in an independent union rather than in a union affiliated with some other union was declared invalid. GAO did not appeal the Board's decision and changed GAO Order 2711.1 to comply.

Monitoring Actions

The Council provided constituent views to GAO management on many issues. In addition, the Council reviewed various draft GAO regulations, provided comments, obtained status reports on topics of concern to constituents, and brought constituent concerns to management's attention. A summary of monitoring efforts follows.

Changes to Performance Appraisal System

During 1991, GAO revised the rating form, the performance standards, and appraisal guidelines. At the request of the Deputy Assistant Comptroller General for Human Resources, the Council commented extensively on draft proposals of these changes. The comments included both overall and specific concerns, as shown in appendix III.

Diversity in GAO

The Council reviewed the draft report entitled Report of the Work Force Diversity Advisory Group and provided comments to the Director of the Training Institute. Overall, the Council representatives were not convinced that GAO had a problem or that even if it did, training would solve it. The full text of the comments is included as appendix IV.

Age Data

The Council formally requested information for bonus and permanent pay increases related to the protected class of age for the 1989 and 1990 performance cycles. The Council had made similar verbal requests for several years. The Deputy Assistant Comptroller General for Human Resources told the Council that the data would be provided, but the data

have not yet been provided. Appendix V is a copy of the Council's request memorandum.

Personnel Appeals Board Oversight Study

The Council reviewed a proposal for a study to be conducted by staff of the PAB on equal employment opportunity (EEO) at GAO. Many of the Council's comments related to the need to review PFP and age discrimination issues, which were not the focus of the Board's proposed study. The General Counsel for the PAB suggested that the Council propose that the PAB conduct a future study to address these issues. The Council has not yet decided whether to submit such a proposal. Appendix VI contains the Council's comments on the General Counsel's draft memorandum to the PAB.

Team Awards

During the Council's March 1991 national meeting, the Deputy Assistant Comptroller General for Human Resources sought the Council's opinion on establishing team awards. The Council raised three major concerns:

- the difficulty in determining what constituted a team,
- the perceived inconsistency of team awards with Pay for Performance, and
- the dilution of individual bonuses.

The Council also expressed concern that team awards could create morale problems within the agency. The Council will continue to follow any proposed changes to the award system.

Proposed Changes to the Promotion Process

Also during the March 1991 meeting, the Deputy Assistant Comptroller General for Human Resources sought Council comments regarding a proposal to separate promotions within units from interunit promotions. The proposal was aimed at speeding up the merit selection process by making the home unit promotions first. Those employees not selected by their home units would be placed on a separate list for interunit selections at a later time. The Council raised several concerns on how this proposal would affect employee choices and management perceptions. GAO did not make the proposed changes to the promotion process.

Changes in GAO's Travel Regulations

The Council monitored and commented on changes made to GAO's travel regulations, including those concerning use of the government Diners Club credit card. The Council provided comments on the regulations prior to their final issuance.

Other Issues Discussed at National Meetings

During national meetings, various GAO management and professional staff presented information on issues of interest. These issues included implementation of the Mission and Assignment Tracking System, building modernization, reorganization of the Office of Information Resources Management, the mediation process, and sexual harassment. In addition, the Council met with the Deputy Assistant Comptroller General for Human Resources to discuss constituent concerns. Among those concerns were the changing role for Band II staff (especially in the regions), the use of Flexiplace, and the implementation of public transportation subsidies. These presentations and the Council discussions were summarized in the minutes of the national meetings.

Efforts to Improve Council Communications

The Council undertook several initiatives to allow more representatives to interact with GAO management and to enhance employee representation. Specifically, the Council

- expanded participation at the bimonthly meetings with representatives from the office of the Assistant Comptroller General for Operations,
- established a formal process for representatives to review and comment on management drafts and proposals, and
- proposed changes to the charter and the bylaws to provide better representation for staff offices.

Representation at Management Briefings

A representative from each of the GAO employee groups has been invited to attend bimonthly meetings with representatives from the office of the Assistant Comptroller General for Operations. In the past, these meetings had been attended primarily by the chair of the Council. To provide an opportunity for more representatives to have firsthand communication with management, an invitation was extended to other representatives to accompany the members from the steering committee. Six different Council representatives attended these meetings during 1991.

Communication With Representatives

To ensure that the Council's comments accurately reflected the views of the Council's membership, the Council revised its process for commenting on draft regulations, reports, and other proposals from GAO management. The revised process expanded the review and comment function to include all representatives rather than exclusive reliance on the Council's steering committee. The improved communication has resulted in providing comments to management that are more representative of constituent concerns.

Staff Office Representation

The Council determined that the representation for staff offices was not sufficient. Consequently, the Council has proposed revising the charter and the bylaws to increase the number of representatives for staff offices from two to five. The proposed changes will be finalized at the next national meeting and will be submitted to the Assistant Comptroller General for Operations for approval.

Future Perspective

During the past 2 years, the Council held considerable discussions concerning its role and effectiveness. The Council decided to focus its primary efforts on major changes taking place within GAO, such as QM, rather than initiating specific projects as the Council had done in the past. Specific actions being taken to increase the Council's effectiveness include

- fostering open dialogue with GAO management,
- participating in the development and the implementation of QM, and
- improving coordination with other GAO employee organizations.

The Council is optimistic concerning its potential for improving the work environment of its constituents. Members are equally certain that they will also be able to contribute to GAO operational improvements.

Fostering an Improved Relationship With GAO Management

The Council believes that its discussions with GAO management have been frank. The Council believes that it will be better able to accomplish its objectives in this environment. The revised system for commenting on draft orders and responding more quickly to management requests has also contributed to a positive working relationship. The Council has proposed periodic meetings with GAO management to discuss issues of interest. In addition, the Council plans to continue exploring ways to further enhance its relationship with GAO management and has designated this as a priority area to address during the coming year.

Participating in Developing QM

The Council will continue its active participation in GAO's implementation of QM. Members serve, for example, on established working groups and anticipate being asked to serve in a similar capacity on future working groups. In addition, the Council will undertake a QM project aimed at increasing its effectiveness. The Council will establish QM teams and receive QM training. It anticipates that this project will provide a unique opportunity to increase its knowledge of QM and will facilitate its being able to contribute to GAO's overall QM implementation.

Increasing Coordination With Other GAO Employee Organizations

During its October 1991 national meeting, the Council discussed the potential benefits of increased communication and coordination among GAO's nine employee organizations on issues of common concern. This discussion was prompted by (1) an Operations Improvement Program (OIP) suggestion prepared independently by a Council member and (2) a presentation by the Chair of the Advisory Council on Civil Rights (ACCR) describing recent ACCR initiatives in this regard. In August 1990, the ACCR submitted an OIP suggestion entitled "Establish and Increase Communication With Other Employee Organizations."

At the conclusion of the discussion, Council representatives agreed that increased coordination and communication among GAO's employee organizations was a worthwhile goal. The Council has solicited opinions from the other employee organizations on the mechanism necessary to accomplish this goal. One possibility is for employee group chairpersons to meet periodically to discuss issues of common concern. The Council plans to analyze the responses and decide on a subsequent course of action.

Election of Steering Committee for 1992

A new Steering Committee was elected at the national meeting in October 1991. The new officers are:

Chair	Alan Byroade, National Security and International Affairs Division
Vice Chair	Ron Guthrie, Denver Regional Office
Secretaries	Jerry Aiken, Seattle Regional Office, and Ed Griffin, New York Regional Office
Study Group Coordinator	Shellee Soliday, Atlanta Regional Office

Mid-Level Employees Council Members for 1991

Steering Committee

Chair	Paul Williams	Boston
Vice Chair	David Utzinger	Chicago
Secretary	Harry Taylor	Norfolk
Study Group Coordinator	Linda Watson	GGD

Members

Judy Czarsty	AFMD
Tom Givens	GGD
Linda Watson	GGD
Bob Rosensteel	HRD
Kopp Michelotti	HRD
David Turner	IMTEC
Alan Byroade	NSIAD
Shirley Hendley	NSIAD
Paula Williams	OGC
Eric Larson	PEMD
Greg Kosarin	RCED
Bill Layden	RCED
Anne Hilleary	OP
Shellee Soliday	Atlanta
Paul Williams	Boston
David Utzinger	Chicago
Mike Murphy	Cincinnati
James Cooksey	Dallas
Ron Guthrie	Denver
Bill Laurie	Detroit
Patricia Foley Hinnen	European Office
Druscilla Kearney	Far East Office
Richard Burrell	Kansas City
Dennis DeHart	Los Angeles
Ed Griffin	New York
Harry Taylor	Norfolk
Gary Johnson	Philadelphia
George Zika	San Francisco
Jerry Aiken	Seattle

Mid-Level Employees Council Members for 1990

Steering Committee

Chair	Rose Imperato	NSIAD
Vice Chair	Jerry Aiken	Seattle
Secretary	Harry Taylor	Norfolk
Study Group Coordinator	Richard Strittmatter	Cincinnati

Members

Judy Czarsty	AFMD
Tim Outlaw	GGD
Linda Watson	GGD
Bob Rosensteel	HRD
Kopp Michelotti	HRD
David Turner	IMTEC
Dade Grimes	NSIAD
Rose Imperato	NSIAD
Paula Williams	OGC
Eric Larson	PEMD
Greg Kosarin	RCED
Dan Semick	RCED
Waylon Catrett	Atlanta
Paul Williams	Boston
David Utzinger	Chicago
Richard Strittmatter	Cincinnati
James Cooksey	Dallas
Barry Tidwell	Denver
Bill Laurie	Detroit
Priscilla Harrison	Far East Office
Michael Higgins	Kansas City
Joe Sokalski	Los Angeles
George Cullen	New York
Harry Taylor	Norfolk
Gary Johnson	Philadelphia
Mary Bufkin	San Francisco
Jerry Aiken	Seattle

Memorandums Commenting on Changes to the Performance Appraisal System



United States
General Accounting Office

Memorandum

Date: February 25, 1991

To: Deputy Assistant Comptroller General for Human Resources - Joan Dodaro

From: Chair, Band II MPAC Council - Paul Williams

Subject: Comments on draft memorandum describing changes to Band I/II and III Appraisals

Thank you for providing the Council the opportunity to comment on the draft memorandum. I would like to qualify the comments which follow by noting that we did not have sufficient time to obtain and synthesize comments from a representative cross-section of constituents. However, each of the Council representatives did receive a copy of the draft memorandum and was afforded an opportunity to comment.

In general, we have no objections to the proposed changes. However, we would like to offer several cautionary comments for your consideration.

First, we encourage you to request comments regarding the legal issues which could be associated with the proposed change from GAO's Office of General Counsel, if such comments have not already been obtained. This comment is prompted by the recent Personnel Appeals Board decision (No. 120-211-02-89), reported in the February 4-8, 1991 Management News, that the appraisal manual is a regulation.

Second, we question the decision to change the format of the appraisal at this point in the assessment year primarily because staff members competing for promotions might have different types of narrative statements available for review by the promotion panel and selecting official. This comment may also be applicable to permanent pay and bonus decisions, if the guidance to the management review group continues to include a review of the appraisal before contributions scores are made.

Third, we encourage you to include samples of the types of narratives expected. The examples would facilitate the understanding of all concerned parties.

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the Performance Appraisal System**

Finally, we received several other comments which might be more appropriately addressed after a review of the revised appraisal manual mentioned on page 2 of your draft memorandum. Rather than include those comments within this memorandum, we would like to suggest that the Council be afforded an opportunity to review the revised appraisal manual and provide comments before it is distributed in final form.

Thanks again for the opportunity to provide comments. The Council representatives are looking forward to meeting with you at our national meeting in Washington during the week of March 18th.

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United States
General Accounting Office

Memorandum

Date: April 30, 1991

To: Deputy Assistant Comptroller General for Human
Resources - Joan Dodaro

From: Chair, Mid-Level Employee Council - *Paul Williams*
Paul Williams

Subject: Enhanced Performance Standards for Bands

In response to your April 1, 1991 memorandum, Council representatives obtained constituent comments on the performance standards planned for use after June 15, 1991.

General

I would characterize the overall responses as ranging from indifference to cautious acceptance. The indifference characterization is based on the perceptions that the process continues to be highly subjective, the outcomes from the process will not change, and the importance of the appraisal seems to be on the decline in the organization.

The caution aspect of the acceptance characterization is based primarily on the fact that the standards and the revised appraisal form are new and that there is a certain amount of apprehension associated with such change. The caution aspect is enhanced, however, by the conspicuous absence of discussion about some of the finer points of the overall process: namely, definitions of terms, responsibilities of reviewing officials, factoring assignment complexity into the appraisal process, and unit flexibility in issuing implementing instructions.

With reference to the standards themselves, the issue which raised the most concern is the explicit emphasis on computer and automated data processing skills. The concern is derived from the perceptions that some units may not yet have received their required tools (both hardware and software) and older staff may be placed at an unfair disadvantage.

Several constituents suggested that the staff be given a year to gain some experience with the shortened narrative change to the appraisal form before requiring use of the enhanced standards. During this period of time, selected test units

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could also use the enhanced standards; test unit experience could then be used to develop a training course to introduce the new standards throughout the organization.

Specific

There were a large number of specific comments. I have attempted to organize them within sub-topics. In addition to the comments specific to the memorandum, there were other comments related to the performance appraisal system which I am including under the topic Other.

Introductory Material

-- page 1 refers to supervisors communicating performance expectations and "how well they perform them" at or near the beginning of the assignment; shouldn't this read "how well they should perform them" (this is a common statement in all three appraisal pamphlets);

-- page 1 refers to critical elements and page 2 (line 15) refers to dimension; we can assume they are the same, but only one term should be used to lessen the probability of confusion;

-- page 1 refers to completing appraisal forms in a "reasonable time"; there should be more specific guidance (such as a number of days) so that supervisors will know what is expected of them;

-- suggest adding a sentence to page 2 indicating the period in which to file a grievance and the management level to contact;

-- page 2 of the Band ID document calls for narrative feedback for each dimension rating; the same page also calls for additional narrative support for ratings below fully successful; if each dimension will be discussed, how much "additional narrative support" is required;

-- it is unclear whether the intent of the prepackaged language is that you must use it verbatim or whether they are examples to be paraphrased; the instructions say "Supervisors must use the written performance standards ...for Fully Successful, Outstanding, or Unacceptable;"

-- the prepackaged language for rating adjectives could result in inflated ratings for outstanding or force ratings into the fully successful category because it is easy to use cited standards;

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-- it is unclear how the unnumbered pages that follow the rating form are to be used; it appears from the discussion on pages 1 and 2 that these are "performance standards"; the manual should provide some insight into how they are to be used;

-- the document does not explain why the changes are needed or why we should view them as better/improvements; perhaps some more explanation of why we are doing this would be appropriate in the introductory section;

Adjective Rating Terms

-- the "no basis for evaluation" indicates that it is a "black or white" assessment; suggest changing this description to read "insufficient basis for evaluation";

-- the "No Basis for Evaluation" column should be eliminated on the rating form (e.g. a dimension could be lined out);

-- the terms describing level of performance are still nebulous; the levels need to be defined and described in a more meaningful fashion;

-- replacing the term "borderline" with "needs improvement" was good; however, doesn't everyone need improvement;

-- the rating category "Needs Improvement" is a great improvement over the term "Borderline"; the connotation is more positive and thus should prove more motivational;

-- the "Needs Improvement" adjective rating should be changed; this description could apply to any rating category; if the category above "Fully Successful" is called "Exceeds Fully Successful" then the category below should be something to indicate something less than "Fully Successful" i.e. marginally successful, minimally fully successful, below fully successful;

-- replacing the term "superior" with "exceeds fully successful" is good and a more accurate description;

-- it is a plus to replace the descriptor "borderline" with "needs improvement"; whether "exceeds fully successful" is better than "superior" is questionable;

-- the "Exceeds Fully Successful" category is an unsatisfactory description of performance; it is a watered-down term that has little or no meaning; seems like a downgrade in performance; a similar complaint was made for

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this category of APSS; if an employee does a little above fully successful than they exceed fully successful; thus, distinctions between fully successful and exceeds fully successful become vague; plus, it is laborious to have to include three words in a narrative rather than one; suggest changing the adjective to excellent or superior;

-- there is, as with the prior system, no provision for people new in a band who are not really "fully successful" yet; they will continue to be rated "fully successful", even though they are not, to avoid the lower "needs improvement", when all that is really lacking is experience; we need to have a category for developmental performance levels that won't penalize people because they are new in the band; either that or we need to change the definition of "fully successful";

-- we should rate people on a scale of 1 to 10; suggested overlay designators are as follows: 9-10 = outstanding, 7-8 = exceeds fully successful, 4-6 = fully successful, 2-3 = needs improvement, 1 = unacceptable; this system of rating provides a lot of flexibility; with the two grades of outstanding, a person can be considered outstanding without necessarily being maxed out in terms of performance; management would have some flexibility to determine who of the best is most qualified for awards; note that fully successful spans three numbers indicating that a wide range of performance qualifies for fully successful;

-- the objective of the rating process seems to be lost; usually when standards are created, there is only one standard for success; if the objective is to judge staff against the fully successful standard, then what constitutes fully successful should be better defined; failure to meet that standard or conversely success in exceeding that standard should be recognized, but written standards for failure or exceptional success should not receive the same attention as fully successful;

-- by removing the tasks that described the standards and by changing the words to describe Borderline and Superior, the validity of BARS has probably been disturbed;

-- the difference between outstanding and exceeds fully successful seems to be quantitative rather than qualitative, at least in some cases; for example, use of one software package is worth "fully successful" while the use of 2 software packages moves in the direction of "exceeds fully successful" to "outstanding" (data gathering and documentation);

-- the standards have examples for the unacceptable, fully

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successful, and outstanding categories but not for the needs-improvement and exceeds fully successful categories; it appears we are receiving fewer examples of what qualifies a rating as needs improvement or exceeds fully successful; it is getting very subjective; the use of key words makes a difference between "usually" and "almost always"; the standards need additional information and clarification to support a shorter rating form;

-- the standards would be more useful if accompanied by some statement about the expected overall distribution of rating marks; raters of Band I and some Band II staff normally can see ways to justify a job dimension checkmark that ranges anywhere from Fully Successful to the top of the scale for a given staff person's performance; because the standards are not inherently objective, raters rely on experience (i.e., information about other ratings -- those they have written, received, and perhaps reviewed) -- to make final decisions; this distorts rating comparability because some staffers feel Fully Successful is a dignified rating for a job well done; others think outstanding/exceptional should be the norm;

Job Dimension Descriptions

-- assignment complexity needs to be addressed at some point: is it only within the appraisal form's Part I(A) or should it also be addressed within Parts II and III; should there be blocks on the form which could be checked to indicate the level of complexity; should this level of complexity be determined by a peer review or panel process;

-- the proposed standards do not address complexity of assignment and the individual's role;

Dimension Standards

-- the rating line scale is at the end of the list of standards; it should be above the first standards to present the concept of what constitutes each of the categories in terms of usually, frequently, almost always;

-- in general, the standards appear more logical and easier to apply than those of the prior system; however, the standards continue to lack specificity and objectives which can easily be measured;

--the standards descriptions provided are vague and general and will not be informative to the ratee;

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-- it is difficult to differentiate between Band ID and Band IFP; the standards do not speak to the expected level of performance for the same task;

-- standards do not appear to be adequate for staff members assigned to lengthy non-evaluator type projects such as a data base project or a task force project;

-- many of the standards seem to depend on the concept of meeting or exceeding agreed upon timeframes; this can be a short-sighted measure of staff performance since we hardly ever assign people to tasks for which good timeframe information is already available; the nonrepetative nature of our work really demands standards which recognize people who apply themselves with dedication and a due regard for quality, as well as an appropriate sense of timing;

-- some standards are not achievable;

-- manner in which standards are usually described will make it very difficult for supervisors to defend in grievances;

-- as with the prior system, there is a major difference between "frequently" and "usually" categories in contrast to going the other way;

-- in reading the "usually" and "almost always" descriptions, it is often hard to tell what the difference is; the wording and meanings of what is being described sound too similar to be any kind of major difference in performance; this also makes the in-between call of "exceeds fully successful" even more nebulous, and may make it an easy out when you can't tell which way it should fall;

-- the document seems to have been prepared in a rush; it requires more clarity, especially with regard to such concepts as "extensive supervision", "average amount of supervision", "meaningful contributions", "appropriately consider", "lacks command of", "thinks on feet", etc; some of the adjectives used to describe performance need to be replaced with less inflammatory language, e.g., "misleads" or "misstates";

-- there does not appear to be a lot of difference between what is expected of Band IFPs and Band IIs;

-- the narrative supporting each rating category should have more distinct, separating lines to make it easier to determine exactly which category a staff member's performance fits; it appears to be very difficult to distinguish among certain categories, especially Needs

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Improvement, Fully Successful, and Exceeds Fully Successful; these three categories appear to merge with no precise distinctions;

-- the display format of the descriptions is unclear, difficult to follow, and poorly labeled; some pages have no scale; the text needs to explain what the standards listed are -- are these examples of activities, are they suggested activities to be appraised or are they examples of acceptable narrative, as suggested in the cover memo, to be used in a performance appraisal;

-- the concise instructions and format are good;

-- the new guidance is easier to use than prior rating manuals and the new terms characterizing levels of performance more descriptive;

-- the differences between the standards for Band ID through Band II are not clear; there are some things a Band II would do that a Band ID may do, but they should not be included in a standard to determine whether the Band II's performance was outstanding; perhaps it points out that Band Is and IIs should not be rated on all the same dimensions;

-- the description of each dimension or critical element seems to be identical for Band ID, Band IFF, and Band II; are Band ID staff really expected to "ascertain congressional interest" and "plan the resources needed for specific assignments", etc.; each of these descriptions should be tailored to each band level and the performance standards should then address the description;

-- the standards further lower the status of the Band II (particular the senior Band II) staff; the new standards tend to focus, in the opinion of some of the respondents, on lesser tasks such as preparing report segments, rather than the types of activities that a senior Band II managing multiple assignments concurrently would perform;

-- the standards seem very harsh for Band IDs or very lenient for Band IIs; since almost all the standards are the same for Band Is and IIs in data gathering and analysis, it appears that just about all Band IIs should get outstanding in these two areas; these two areas for Band IIs are like the former administrative dimension, it only matters if the person does not do a good job in the area; maybe a pass/fail rating in these dimensions is appropriate;

-- the standards for data gathering and documentation places too much emphasis on use of and proficiency with

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computer functions and software packages; especially under the almost always standards; as evaluators we often use DMTAG or other experts in computer software packages; furthermore, not all assignments lend themselves to the use of collecting and analyzing data on a computer;

-- there is a new emphasis on use and knowledge of computers and software; this is fine, except it is inappropriate when computers and training are lacking; so, several staff suggested taking those standards out until the agency gets its full complement of hardware and software;

-- adopting the new standards would put into place new performance expectations, particularly related to proficiency in the computer area, without allowing employees to develop the requisite skills; this action could result in litigation; using computer skills as a performance measure may unduly discriminate against older staff; performance should be judged on what is accomplished, not on how it is accomplished;

-- although it appears that the decision has been made to go to this system, it should not be instituted immediately; there should be a period where the staff has time to digest what this means and can be prepared to meet the standards, especially with regard to data processing proficiency;

-- almost half of the performance standards related to data gathering and documentation concern proficiency in ADP; it seems rather unfair that the organization, which has not included this as a ranking factor in its job vacancy announcements, turns around in the performance appraisal system and considers it a dominant performance measure; such emphasis on ADP, without adequate notification that the organization now considers it essential, is unfair and will probably lead to litigation; the system should be announced, but not instituted until the 1993 rating period;

-- the standards for written and oral communication seem to place an increased emphasis on contacts outside GAO i.e. conferences, the press, technical associations and writing papers for technical conferences; the mainstay of GAO work is to get the audit work done and provide the information to our constituents, Congress; performance of written and oral communications should be related to our primary objective of auditing the executive branch and not marketing GAO;

-- the working relationships element identifies hesitancy or refusal to take on additional or undesirable work as unacceptable performance; while refusal may be considered unacceptable, does hesitancy really constitute unacceptable behavior; couldn't informed decision making be

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misinterpreted as hesitancy;

-- the final oral communication standard refers to "potential clients" and "clients"; can these individuals be identified specifically:

-- a few of these standards do not seem to create clear distinctions between the adjective levels; for instance, under Planning for Band ID, the staff member who "maintains contact with and coordinates own work and problems encountered with others who need to know" seems to be very close to one who "identifies constraints in project work and informs others to accomplish tasks in a timely manner"; yet, one is fully successful and the other is outstanding; similarly, the analysis selection planning standard for Band IFP staff and the referencing analysis standard for Band II seem so close that they would be difficult to use as distinguishing criteria;

-- the workpaper documentation standard for all staff includes a parenthetical comment about developmental staff which appears inappropriate; it should not apply to Band IFP or Band II staff, and "for development staff" is redundant in standards for Band ID staff;

-- data analysis includes activities that are data gathering such as "gather error-free.." evidence; this is unclear, since it may be impossible to gather error-free data; in addition, "selects research methodology" is a planning activity, not data analysis;

-- the concept of fairly assigning responsibilities to staff belongs under "Supervision", not "Working Relations";

Utility of Narrative

--it is commendable to shorten ratings by eliminating a lot of narrative;

-- the limited narrative lessens the opportunity to communicate the subjective analysis which led to the determination of the checkmark;

-- there is concern about the ability of the proposed briefer rating system to support GAO decisions for making pay and bonus decisions;

-- with less narrative and prepackaged language the ratings will not be as useful to reviewers;

-- the reduced ratings are in a similar format to the shortened APSS ratings; for the panel to assess placement of

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administrative staff into pay adjustment categories, supervisors had to be interviewed to verify placement, (the shorter narrative did not provide enough information); for evaluators, the new practice of not requiring narrative descriptions for each performance dimension will cause problems; without the added detail, it will be difficult, if not impossible, to distinguish "shades" of performance; how will bonus and permanent pay panels handle less information on the ratings; will the proposed performance appraisal system provide GAO with good input to make pay decisions; with the past emphasis on detail to support performance assessments in ratings, the reduced narrative could make the agency vulnerable to negative actions pertaining to pay decisions (e.g. grievances, suits);

-- the proposed appraisal will not enable supervisors and managers to tell what kinds of help a person needs because the overall paragraph on performance will be too general and allows raters to mix up the rating adjectives;

-- overall, the proposed changes look good; the approach of reducing narrative on ratings for more senior staff is a positive step because it should shorten the time needed for management review and PFP decision making; however, this change adds risk to our personnel decisions by making ratings less comparable; this will create the impression that PFP decisions are less well-founded;

-- staff find that the reduced narrative contradicts the other agency policy of feedback and increased communication on performance; also, a dramatically reduced narrative provides an opportunity for abuse, unconsidered rankings, and unclear messages to the ratee; it also eliminates the main way for a reviewer to assess the evidence for a rating;

-- shorter ratings are a step in the right direction; however, a minority of staff were concerned that the shorter ratings would not provide sufficient information for making equitable pay decisions;

Other

-- we need more flexibility in the rating system to reward fine performance and to give it a name that is rewarding; after all, we "hire the best"; to hire the best and call them fully satisfactory is not emotionally satisfying; we need to call excellent by that name, but not be locked into having to reward or promote everyone who enjoys the descriptor "excellent";

-- do the proposed revisions take into account TQM and how it may affect our perceptions of staff performance; will we

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need to revise again...soon; should we wait;

-- what is streamlined about the standards; they did not seem any easier to use;

-- given the reduced narrative and the de-emphasis of ratings, why bother doing a rating; about the only time a rating is needed is when we want to fire someone;

-- based on the inconsistencies in the standards themselves, the project seems to have been rushed and is not ready for implementation immediately;

-- changes are predicated on speeding up the PFP process rather than improving the performance appraisal process.

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GAO

United States
General Accounting Office

Memorandum

Date: May 21, 1991

To: Deputy Assistant Comptroller General for Human
Resources - Joan Dodaro

From: Chair, Mid-Level Employee Council *Paul Williams*
Paul Williams

Subject: Appraisal Guidelines

In response to your May 7, 1991 memorandum, Council representatives endeavored to gather, analyze, and communicate to you comments on the revised appraisal guidelines. However, the required turnaround date of May 20th did not permit sufficient time to prepare a quality response to your request. The comments which follow only represent the hurried analysis of a handful of Council representatives and should not be construed as representing the consensus of the Council or our constituents.

Comments

p4 -- "Rater discretion should be used to determine when and how changes need to be documented"...suggest that changes be documented and that documentation show that agreement was or was not reached on the changes;

p5 -- documenting expectations is left to the discretion of the unit head. The guidelines should contain a clear summary of which elements are discretionary to the unit head and those which are not discretionary. For example, could a unit head require appraisals be prepared within 25 days or 45 days after the end of an assignment, rather than the 30 days specified on p 17?;

p6 -- "Part I may be prepared by the ratee and revised and amended, as necessary, by the rater"...suggest adding "substantial changes should be agreed to by the rates;

p8 -- "Part III is to be completed by the rater and may include"...suggest changing the "may" to "should";



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p9 -- the "Guidelines for Preparing Summary Narrative" make a distinction between supervisory and leadership assignments. Does this mean role on the assignment or types of tasks done?;

p10-- the example of summary narrative does not show predominant behavior. Instead, it shows examples of specific behavior, but does not relate the behavior to the time period in question. It would be better to relate behavior on a given dimension to the amount of time or work spent on a dimension over the rating period. Once the amount of time or work is characterized, the rater should follow with examples to support the ranking factor;

p10--it is not clear whether rater should use the underlining and brackets or whether they are used just as part of the example. This should be clarified;

p11-- "If comments are provided, they should be submitted as quickly as possible but no later than 5 calendar days"... suggest "If comments are provided, they should be submitted within 5 calendar days";

p11--the conclusion of a performance appraisal period which results in "surprises" rather than "no surprises" is not handled in a systematic manner. There appear to be several options available to the ratee -- comments only, no comments but a need to vent frustration, accelerated grievance (but this calls for an informal resolution period), a desire to explore informal resolution without turning the process into a grievance, etc. On top of all the at times confusing options is the emotion of the moment and the requirement to make far-reaching decisions ("win the battle/lose the war", what is part of the "permanent record") within a specific, relatively short time period. This part of the appraisal process needs review and rethinking. It needs to be better organized and more systematic;

p20--the process of the reviewing official changing the checkmark and appropriate narrative should include (1) informing the ratee of the reviewing official's actions and (2) requiring the reviewing official -- and not the rater -- to prepare the narrative.

Memorandum Commenting on Draft Report of Work Force Diversity Advisory Group



United States
General Accounting Office

Memorandum

Date: September 3, 1991
To: Director, Training Institute - Terry E. Hedrick
From: Chair, Mid-Level Employee Council - *Paul Williams*
Paul Williams
Subject: Comments on the Draft Report of the Work Force Diversity Advisory Group

Thank you for providing the Council the opportunity to comment on the subject report. The draft report generated a significant amount of discussion among Council representatives and our constituents. Please be advised that the Council would be most willing to provide continued assistance to the Institute next year as you work to develop and pilot test training materials.

General Comments and Recommendations

In general, respondents attempted to follow the analysis presented in the draft report. The comments received indicated that the respondents were: (1) not convinced that there was a problem; and, (2) assuming there was a problem, not convinced that a special, training-based solution was the optimum answer. The lack of conviction about the problem seems to stem from the fact that we have seen the work environment change over the last 10 or 15 years both in terms of the composition of the workforce as well as the general acceptance of such workplace initiatives as flexitime, part-time employment, on-site day care, and on-site health facilities. While the workforce changes can for the most part be traced back to GAO's equal employment opportunity and affirmative action initiatives, the workplace changes seemed to have evolved as needed and not as the result of any sort of futuristic master strategy. At the same time all of these work environment changes were evolving, it is advertised that the organization has been increasingly more productive, more effective, and very competitive in recruiting the best and brightest.

With reference to a solution to the perceived problem, respondents seemed to object to the notion of training as a panacea. While the draft report contained agencywide

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recommendations as well as training recommendations, the sense was that after everyone has received the training we will then declare ourselves a successfully diverse organization. It is a lot more complicated than that, but numbers of staff members trained serves as a nice objective basis on which to make an argument that we are a success story. Several respondents noted that one of the pillars of a Total Quality Management (TQM) program is continuous improvement and that diversity initiatives might be better addressed within the context of TQM. If there is general acceptance that there is a "problem" which requires a solution, the Council recommends that the advisory group contact the leadership of GAO's TQM program to determine what potential exists to introduce "necessary" work environment changes to the organization within the TQM framework.

Finally, it is clear that some respondents discerned a discriminatory overtone to the entire draft report. These respondents were disappointed and frustrated at an overall message that generally seemed to say: women and minorities are all good people, white males are all bad people who require special training. While I am certain that this message was not intended, it was certainly clear that it was communicated to some reviewers. In light of these comments, the Council recommends that the advisory group review the draft report once again to minimize the probability that such interpretations can be drawn and distract readers from focusing on the substantive issues raised by the advisory group.

Specific Comments

The following are some specific comments received:

- the draft report should be tied into GAO's mission; it should convincingly point out what GAO can gain if it takes the recommended approach or stand to lose if it does not;
- the draft report does not detail what the problem is or justify its assumption that the problem will be greater in the future as GAO's work force becomes more diverse;
- while some comments concerning the task force's recognition of the various small "groupings" were positive, the majority of the comments indicated that such small groups (as outlined in point 4, page 19) serve only to polarize rather than to unite the staff;
- the model describing the six sequential stages of an organization's development (page 10ff) does not present

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evidence that an organization should strive for Stage 6; the benefits of obtaining the highest stages are not clear;

- the recommendations are vague; except for the training program, it is not clear what we in GAO will be doing differently;
- it appears that a lot of resources are being targeted to something that has not proven to be a problem;
- it is not clear that a supportive work environment will automatically lead to the organization being able to better satisfy our customer's needs;
- everyone probably agrees that the organization needs to change with the times to compete for the most talented workers in the future; however, the report overreacts in responding to increasing diversity in the workforce;
- with regards to the agencywide recommendations, there is no need for a separate plan for implementing a comprehensive diversity strategy; diversity can and should be dealt with in conjunction with existing programs, including EEO, affirmative action, and TQM; we need to broaden our existing perspectives to address overall workforce issues, including diversity, quality, and effectiveness;
- with regards to training recommendations, the report does not make the case that any new courses are necessary; it would be easier and better to incorporate dealing with diversity in existing courses; in addition, the proposed training seems to focus on diversity "awareness"; this seems to be unnecessary as most of us are aware of changes in the workforce, not only at GAO, but in many other organizations; training related to workforce diversity should focus more on how to manage effectively in a diverse environment and how to use the increasing diversity to improve the efficiency of GAO's operations;
- given that one of the pillars of TQM is a passion for continuous improvement, it appears that workforce diversity initiatives would be a natural outgrowth of a conscientious TQM program; there does not appear to be a convincing case that a separate GAO workforce diversity initiative is really necessary;
- Orwell's 1984 was only 7 years late in arriving at GAO; the evidence presented is not at all convincing that GAO has a problem;

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- extremely heavy reliance on training as the magic answer;
- could be the first GAO-wide TOM project;
- how can anyone argue or disagree with the basic premise that "everyone should be nice to everyone?";
- I agree that a diverse work force and meeting the needs of that work force is the right thing for GAO to do. However I strongly disagree in the manner GAO is trying to do it. I believe in Equal Employment Opportunity (EEO). All of GAO's hiring and promotions should be based on EEO. The best available qualified people should be hired and promoted without regard to gender, race, age, religion, disability, and national origin. If not, an organization is just paying lip service to EEO. Affirmative Action Programs and true EEO are totally and completely incompatible. An affirmative action program is nothing more than institutionalized discrimination. GAO should spend more time and money on ferreting out true discrimination and sexual harassment and discharging anyone knowingly participating in these practices;
- number 5 on page 16 of the report suggests an affirmative action plan for GAO's SES and top management positions. May I ask why? Are there known cases of discrimination that have prevented someone who was best qualified from getting a top management position? If so, let us give the harmed person a top position and most importantly fire the person or persons who did the discrimination;
- number 5 on page 19 is good. However, if GAO is to have any credibility in terms of EEO and prevention of sexual harassment then any employee regardless of position must be discharged if shown to have knowing discriminated or sexually harassed;
- the more time, energy and scarce resources devoted to the subject of diversity only creates more friction among these groups. Each one thinks of itself as more special with the bonafide need for every courtesy and recognition to feed their own ego's and social agendas. The office-wide recommendations on pages 15/16/17 are an absolute disaster--nonsense of the 1st order. These groups will only be satisfied when the last male caucasian is gone; then they can really start fighting among each other;

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- I totally concur with recommendation 3 on page 15 and recommendation 6 on page 17. Unfortunately, any changes in these areas will be slow and by the time GAO comes to grips with them a new CG will be in place. As for GAO, I still see much of it in stage 2 or stage 3 with some limited stage 4 successes. A very important demographic profile dimension is missing in appendix 2, and that is a breakdown of where those staff are within band level;
- diversity is good and it makes sense to employ a representation of the U.S. population qualified for GAO's work. What does not make sense is to accelerate a GAO profile at the expense of the totally innocent male caucasians. GAO should only have an affirmative action plan when it also has a plan to compensate those who, through no fault of their own, are now out of favor. What does it profit GAO to demoralize a large segment of its work force? EEO and fairness demands equitable treatment for all; not favors for a few. Its time to reconstitute the groups based on age, sex, race, grade level, and years of GAO employment before evaluating who got what. Each should get its proportionate share;
- the report is long on platitudes and short on specifics;
- is "diversity" going to be a separate job dimension or combined with EEO/Working Relationships?;
- I don't think "diversity" is really any different from the job dimension EEO/Working Relationships. If any differences between co-workers or between supervisor and employee affect job performance then the proper place for negative comments would be "Supervision" or "EEO/Working Relationships";
- if "diversity" is to be a separate job dimension, then the appraisal and award systems will be open to even more manipulation than already exists. Management assigns people to the various EEO Committees or designates employees to work on management administrative projects which can help raise the contribution points for bonuses. Most employees are never given similar opportunities. The perception is that management gives these opportunities to those it wants to promote or give bonuses to. Overall, this seems like one more inappropriate use of scarce GAO resources. We will all be busy talking "diversity" instead of doing GAO audits;
- the report raised some good ideas but did not develop them. For example, the cafeteria benefit plan sounds good but there are no specifics about it or how this

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idea derived from a diversity problem:

- the bottom line is to treat everyone with sensitivity, yet somehow this report is bending over backwards to be sensitive;
- on page 5 reference, 2nd paragraph line 6, makes reference to female head of household - isn't this bias? What may be more appropriate is "single head of household" since some men are managing families alone, too;
- on page 9, 2nd paragraph there is a lot of discussion about advancing certain employees and giving them advantages not given others. This special treatment adds to perceived and actual inequity and dissention in the workforce. It does not foster team building;
- on page 16, we also question what modifications would be made to appraisal and award systems to encourage support of diverse work force. This should already be covered under EEO, supervision, human resource management;
- I found it interesting that the most important agencywide recommendation was the last one -- number 9 on page 17. What really needs to be done is improve communication. Only through improved communication among diverse groups can work be accomplished efficiently and effectively with everyone feeling they contributed. If we conquer this recommendation, the others things should follow;
- what is meant by the bullet on the bottom of page 18 and top of page 19. The terms biases, prejudices, and increasing sensitivity to and appreciation of differences were presumptuous and too ambiguous. The report seem to be trying to be too simplistic, too supersensitive;
- regarding the objective laid out on page 13, last paragraph, to have "members of diverse cultural and social groups as full participants at all levels of the organization...". How would the agency measure this? The question of measurement also came up with respect to appraisals and awards;
- regarding page 9, 2nd full paragraph ... it implies that some employees are not diverse. Based on the definition, all employees are diverse;... smacks of reverse discrimination. Implies that those not considered diverse would not have opportunities; ... during a 2-3 year period in the late 70s or early 80s,

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GAO decided to give special counseling to women and minorities. The goal was to help them develop the skills to be promoted. Most women and minorities resented this. They felt that the process forced management to focus on weaknesses that they (management) then used to not promote them. Without the program, they (management) may not have focused on these weaknesses -- in fact, management may not have even noticed them. Also, women and minorities felt that if the same thing had been done for white males, management may have been forced to admit that white males also had weaknesses;

- on page 16, # 4 "menu" section in parentheses... should add the word "increasing" after the word "reducing";
- on page 16, #4 appraisal systems... this would be similar to the current EEO category; white males often get exceptional in this category for only doing what is expected -- people seem to be shocked they can get along with women and minorities; on the other hand, women and minorities are expected to get along with everyone, and therefore, it is no big deal when they do; the same could easily hold true for a "diversity" category on the rating;
- on page 16, #5 ... there should be emphasis on promoting from within for women and minorities; why can white males come in at the entry level, work only for GAO as an evaluator, and have a bachelor's degree, and still make it to SES -- while women and minorities must have other (non-GAO) work experience, master degrees, and work in different parts of GAO in staff and line positions?;
- on page 17, #6 ... under the current rules, GAO can have diverse representation on promotion panels for Band II positions. The rules require the panel members to be one band higher than the persons being assessed. There are enough Band II women and minorities right now that could serve on these panels -- management just hasn't used this opportunity.

Memorandum Requesting Age Data

GAO

United States
General Accounting Office

Memorandum

Date: April 8, 1991

To: Deputy Assistant Comptroller General for Human Resources - Joan Dodaro

From: Chair, Mid-Level Employee Council - *Paul Williams*
Paul Williams

Subject: Age Data

Thank you for participating in our national meeting last month. Council representatives found your candid discussion of current management and policy topics to be highly informative.

One of the topics discussed was the Council's long-standing interest in obtaining data related to the protected class of age. We learned that the Advisory Council on Civil Rights (ACCR) might have already requested such data from your office. Upon my return from Washington, I received a copy of the ACCR Chair's March 15, 1991 memorandum to you requesting age statistics and providing you with pro forma tables as suggested formats. Through this memorandum, I would like to request that the Mid-Level Employee Council also be provided the same set of data that will be forwarded to the ACCR. In addition, the Council requests that the age data be categorized by race and gender. We would also be interested in obtaining any analyses of the data that might be performed by your office or others.

Thanks for your help.



Operations Improvement

Memorandum to PAB General Counsel Regarding Proposed EEO Oversight Study

MPAC MEMORANDUM

Date: February 15, 1991
To: General Counsel, PAB - Carl D. Moore
From: Band II Chair - Paul Williams (Boston)
Subject: PAB Request for Response Regarding Proposed EEO Oversight Study

This memorandum is in response to your February 4, 1991 memorandum to Chairs of GAO Employee Groups requesting comments on your draft EEO Oversight Study memorandum to the Personnel Appeals Board.

In general, we have no objection to anything in the proposed memorandum. However, we would like to offer ~~some constituent~~ comments for your consideration in preparing the final version of the memorandum.

1. We would like the Board to discuss the protected class of Age and include in the EEO Oversight report a discussion of the unique characteristics of Age as a protected class and how the Board chose to handle the Age issue in the report. If the Board believes that an analysis of Age statistics would be outside the scope of the planned report, we would like to understand the Board's plans to address the Age issue in the future.
2. The Board's study may want to consider analyses of factors such as bonuses and permanent pay increases, as well as promotions.
3. Roles and responsibilities assigned to individuals would be another factor to consider since an employee's ability to be promoted, receive pay increases, and obtain bonuses is directly related to the type of work assigned.
4. The Board may also want to look into years of relevant work experience of the population to determine whether there are differences in how new employees versus more experienced employees are being treated.
5. For purposes of analysis, the study may want to obtain data that will enable them to look at variations between regions and headquarters as well as the agency as a whole.
6. The Board may want to reference the July 1985 EEO Oversight Study and describe its relevance to the planned study.
7. Finally, the impact of banding on promotions and pay

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Memorandum to PAB General Counsel
Regarding Proposed EEO Oversight Study

increases should be part of the study. Combining the GS-13s and GS-14s enables the agency to "inflate" its workforce statistics, i.e. minorities were underrepresented at the previous GS-14 level. The agency may very well appear to have good representation of minorities at the Band II level, but it will be harder to distinguish if minorities are being provided the opportunities to fairly compete for pay increases and bonuses. This is another reason to look at the roles and responsibilities issue mentioned above.

Thank you for the opportunity to provide comments and to participate in this important process. Also, thanks for clarifying my understanding of the study's relationship to GAO's Office of Affirmative Action Plans during our telephone conversation earlier this week. If the Council can be of any additional help, please contact me at 617-565-7468.

